

WEIL, GOTSHAL & MANGES LLP  
Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
Ray C. Schrock, P.C. (*pro hac vice*)  
(ray.schrock@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
767 Fifth Avenue  
New York, NY 10153-0119  
Tel: 212 310 8000  
Fax: 212 310 8007

KELLER & BENVENUTTI LLP  
Tobias S. Keller (#151445)  
(tkeller@kellerbenvenutti.com)  
Jane Kim (#298192)  
(jkim@kellerbenvenutti.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

CRAVATH, SWAINE & MOORE LLP  
Paul H. Zumbro (*pro hac vice*)  
(pzumbro@cravath.com)  
Kevin J. Orsini (*pro hac vice*)  
(korsini@cravath.com)  
Omid H. Nasab (*pro hac vice*)  
(onasab@cravath.com)  
825 Eighth Avenue  
New York, NY 10019  
Tel: 212 474 1000  
Fax: 212 474 3700

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF FILING OF AMENDMENT  
TO TORT CLAIMANTS  
RESTRUCTURING SUPPORT  
AGREEMENT**

**[Relates to Dkt. No. 5038]**

Date: December 17, 2019  
Time: 10:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 PLEASE TAKE NOTICE that, on December 9, 2019, PG&E Corporation and Pacific Gas and  
2 Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-  
3 captioned chapter 11 cases, filed the *Debtors’ Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and*  
4 *Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (i) Authorizing the Debtors and TCC to Enter*  
5 *into Restructuring Support Agreement with the TCC, Consenting Fire Claimant Professionals, and*  
6 *Shareholder Proponents, and (ii) Granting Related Relief* [Docket No. 5038] (the “**Tort Claimants**  
**RSA Motion**”). A copy of that certain Restructuring Support Agreement, dated as of December 6, 2019,  
among the Debtors, the TCC, the Consenting Fire Claimant Professionals, and Shareholder Proponents  
parties thereto (the “**Original Tort Claimants RSA**”) was attached as **Exhibit A** to the Tort Claimants  
RSA Motion.

7 PLEASE TAKE FURTHER NOTICE that, on December 16, 2019, pursuant to Section 7 of  
8 the Original Tort Claimants RSA, the Debtors, the Requisite Consenting Fire Claimant Professionals<sup>1</sup>,  
9 and the Shareholder Proponents agreed to an amendment of the Tort Claimants RSA (the “**Tort**  
10 **Claimants RSA Amendment**”) that, among other things, eliminates Section 3(a)(iii) of the Original  
11 Tort Claimants RSA that would automatically terminate the Original Tort Claimants RSA if the  
Governor of California advises the Debtors that their chapter 11 plan does not, in his sole judgment,  
comply with Assembly Bill 1054 and the chapter 11 plan is not modified in a manner acceptable to the  
Governor by December 17, 2019.

12 PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit 1** is a copy of the  
13 executed Tort Claimants RSA Amendment.

14 PLEASE TAKE FURTHER NOTICE that copies of the Tort Claimants RSA Motion, the  
15 Original Tort Claimants RSA, and Tort Claimants RSA Amendment can be viewed and/or obtained: (i)  
16 by accessing the Bankruptcy Court’s website at <http://www.canb.uscourts.gov>, (ii) by contacting the  
17 Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the  
18 Debtors’ notice and claims agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by  
calling (844) 339-4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties  
or by e-mail at: [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com). Note that a PACER password is needed to access documents  
on the Bankruptcy Court’s website.

19  
20 Dated: December 16, 2019

21 **WEIL, GOTSHAL & MANGES LLP**  
22 **CRAVATH, SWAINE & MOORE LLP**  
23 **KELLER & BENVENUTTI LLP**

24 /s/ Thomas B. Rupp  
25 Thomas B. Rupp

26 *Attorneys for Debtors and Debtors in Possession*

27  
28 <sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Tort  
Claimants RSA Motion.